


 X-574
 NCB
 FYI PCW

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 File

TO: Tom Benz
 FROM: Jim Buckley *Buckley* - Emelle Technical Mgr
 DATE: June 5, 1990
 RE: Monsanto Proposal
 Dead Creek - Sector B

CONFIDENTIAL 92-CV-204-WDS

Based on a review of the background data and analytical data submitted, I offer the following observations:

1. PCB contamination is evident throughout the creek bed as found in 3 separate sampling events.
2. Heavy metal concentrations in many cases exceed EP Tox or TC "calculated" thresholds.
3. Other halogenated organic compounds present in soil besides PCB's include:

Dichlorobenzenes	(X125, P1, SD1)
Dichlorophenols	(X125, SD1)
Trichlorobenzene	(X125, P1, SD1, SD2)
Ethylene Chloride	(S07, S010, R012)
Pentachlorophenol	(SD1, SD3)
Tetrachlorobenzenes	(SD1)
2,4-Chlorophenol	(SD1)
Hexachlorobenzene	(SD2)
2,3,7,8 Tetrachloro-dibenzo-p-dioxin	

4. For purposes of classification, no knowledge of process is imparted or implied, therefore a specific source (K waste) or non-specific source waste (F waste) is not determinable and no discussion of spills of listed wastes (U, P) is read in the assessment.

More knowledge of the processes entering the creek should be explored before determining that the soils, when excavated, would be non-listed.

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